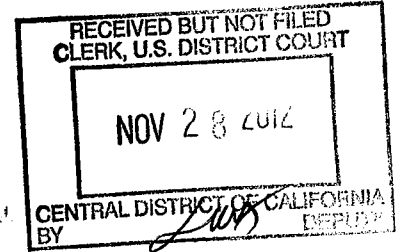
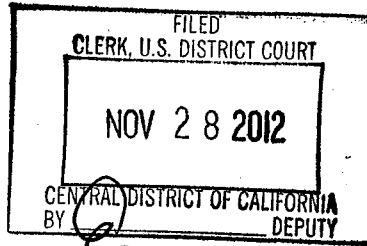


Navin Batra  
54 Meredith Rd.  
Colonia, NJ 07067



United States District Court - Central District of California

Manwin Licensing International S.A.R.L.,  
Plaintiff  
vs.  
Navin Batra,  
Defendant

Case No.: CV12-05993-CBM-JC

ANSWER

COMES NOW the Defendant Navin Batra in answering the allegations of the Complaint on file herein, affirms, denies and alleges as follows:

Answering the allegations of Paragraph 1 of the Plaintiff's Complaint, Defendant affirms in part the purpose of the Action, yet denies the insinuation that any domain names were registered unlawfully or in bad faith.

Answering the allegations of Paragraph 2 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 3-4 of the Plaintiff's Complaint, Defendant affirms in part owning no rights in the trademarks YOUPORN or TUBE8, yet denies intentionally seeking to deceive consumers into believing that any websites registered by the Defendant are affiliated with Plaintiff's trademarks.

Answering the allegations of Paragraph 5-8 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 9 of the Plaintiff's Complaint, Defendant denies the insinuation that any domain names were registered unlawfully or in bad faith.

Answering the allegations of Paragraph 10-12 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 13 of the Plaintiff's Complaint, Defendant affirms in part the description of the 1) WhoIs database and 2) privacy services, however Defendant strongly denies the insinuation that Defendant used such privacy services for "nefarious ends". Defendant asserts that privacy services have multiple legitimate uses, and that the use of such privacy services by the Defendant was legitimate and lacked intent to deceive.

Answering the allegations of Paragraph 14-16 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 17 of the Plaintiff's Complaint, Defendant affirms in part that the YOUPORN mark evokes consumer recognition, however

Defendant denies that the same level of consumer recognition exists when the mark is directly preceded, interposed, or followed by another word or phrase that changes the perceived meaning of the entire phrase.

Answering the allegations of Paragraph 18-20 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 21 of the Plaintiff's Complaint, Defendant denies registering multiple infringing domains either by himself or in concert with other individuals or entities.

Answering the allegations of Paragraph 22 of the Plaintiff's Complaint, Defendant denies all claims of willful infringement. Moreover, Defendant asserts that privacy services have multiple legitimate uses, and that the use of such privacy services by the Defendant was legitimate and lacked intent to deceive.

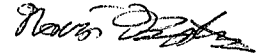
Answering the allegations of Paragraph 23-24 of the Plaintiff's Complaint, Defendant affirms all facts.

Answering the allegations of Paragraph 25 of the Plaintiff's Complaint, Defendant denies that the same level of consumer recognition exists when the referenced "YOUPORN" mark is directly preceded, interposed, or followed by another word or phrase that changes the perceived meaning of the entire phrase.

Answering the allegations of Paragraph 26 of the Plaintiff's Complaint, Defendant affirms in part owning no rights in the trademarks YOUPORN or TUBE8, yet denies intentionally seeking to deceive consumers into believing that any websites registered by the Defendant are affiliated with Plaintiff's trademarks.

Answering the allegations of Paragraph 27-30 of the Plaintiff's Complaint, Defendant denies all facts and claims.

November 25, 2012



Navin Batra